

EXHIBIT 1

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS LIABILITY
LITIGATION

MDL No. 2419
Dkt. No. 1:13-md-2419 (RWZ)

THIS DOCUMENT RELATES TO:

Ziegler, et al. v. Ameridose, LLC, et al.
Civil Action Number 1:13-cv-12588-FDS

NOTICE OF DEPOSITION

Please take notice that pursuant to Rule 30 of the Federal Rules of Civil Procedure and MDL Order No. 10 (Document #1426) the Plaintiffs' Steering Committee will take the deposition of Dr. Patty Wright, M.D., on May 27, 2016 at 9:00 a.m. at Wiseman Ashworth Law Group, PLC, 511 Union Street, Suite 800, Nashville, Tennessee 37219. The deposition will be recorded by stenographical means and by video. A request for records is attached as Exhibit A hereto.

Dated: May 3, 2016

Respectfully submitted,

s/ Mark P. Chalos

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Plaintiffs' Steering Committee and Federal/State Liaison

CERTIFICATE OF SERVICE

I, Mark P. Chalos, hereby certify that I caused a copy of the foregoing to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Dated: May 3, 2016

s/ Mark P. Chalos
Mark P. Chalos

EXHIBIT A

The word “documents” shall be defined to include any kind of written, typewritten, printed or recorded material whatsoever, including without limitation, statements, notes, transcription of notes, memoranda, letters, telefaxes, publications, agreements, pictures, photographs, audio tape recordings, video tape recordings, cassettes, transcriptions of any such recordings, log books, business records, and computer files or electronic data such as e-mails or instant messages.

Pursuant to the Federal Rules of Civil Procedure, this will serve as a request for the Deponent, Patty Wright, M.D., to produce the following documents at least seven days before the deposition:

1. All medical records for Adam Ziegler.
2. All documents collected by you or your counsel from the releases provided by Adam Ziegler with his plaintiff profile form in this litigation.